

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: YOUSSEOU DIAGNE

Debtor(s)

**Case No. 16-14053
CHAPTER 13 PLAN**

The debtors propose the following plan of reorganization:

1. The future earnings of the debtor are submitted to the supervision and control of the trustee and the debtor –debtor shall pay to the trustee the sum of **\$1,000.00 monthly for months 1 through 60.**

a. **PRIORITY CLAIMS:** Full payment in deferred cash payments of all claims entitled to priority under 11 U.S.C. 507 and the Trustee's Commission under 28 U.S.C. 586 (e) (B), shall be paid the following amounts prior to payments of other claims:

Trustee	\$
Zachary Perlick, Esquire	\$ 4,500.00
City of Philadelphia	\$ 4,080.00

b. **(1)SECURED CLAIMS: (ARREARS)** Secured claims shall be the net amount due as of the date of filing or the value of the collateral, whichever is less. Creditors shall retain their liens until the allowed secured portion of the claim is fully paid. The following creditor claims are fully secured and the Debtor will pay the current monthly payments as they become due directly to the secured parties; arrears to be paid through the Chapter 13 Trustee.

Acquired Capital	\$26,000.00
Specialized Loan Servicing	\$13,000.00

All other secured creditors to be paid outside of the Plan.

c. **UNSECURED CLAIMS:** Subsequent to full payment of priority and secured claims, the Trustee shall pay pro rata dividends to unsecured creditors whose claims are duly allowed.

2. **Summary**

Administrative/Unsecured	\$12,420.00
Zachary Perlick, Esquire	\$ 4,500.00
City of Philadelphia	\$ 4,080.00
Acquired Capital	\$26,000.00
Specialized Loan Servicing	<u>\$13,000.00</u>
Total Plan	\$60,000.00 / 60 = \$1,000.00.

3. **LEASES AND EXECUTORY CONTRACTS:** The Debtor assumes the following unexpired leases and executory contracts and rejects all others.

None

4. **LIEN AVOIDANCE:** The Debtor intends to file a motion pursuant to F.R.B.P. 4003(d) to avoid all nonpossessory, nonpurchase money security interests and judicial liens as provided by 11 U.S.C. 522(f) and the plan herein provides for payment of such liens as general unsecured claims only. Any creditor's claim or portion thereof not listed in paragraph "b" above is to be treated as an unsecured claim, and unless and objection is filed prior to Confirmation, unsecured status will be binding upon said creditor.

Title to the debtor's property shall vest in the debtor upon confirmation of the plan or upon dismissal of the case.

Acceptance may be mailed to:

Zachary Perlick, Esquire
1420 Walnut Street, Suite 718
Philadelphia, PA 19102

/s/ Zachary Perlick
ZACHARY PERLICK, ESQUIRE